

R. Michael Turnnspeed, Director

ALLEN BIAGGI, Administrator

(775) 687-4670
TDD 687-4678

Administration
Water Pollution Control
Facsimile 687-5856
Mining Regulations & Reclamation
Facsimile 684-5259

State of Nevada
KENNY C. GUINN
Governor



Waste Management
Corrective Actions
Federal Facilities

Air Quality
Water Quality Planning

Facsimile 687-6396

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

333 W. Nye Lane, Room 138
Carson City, Nevada 89706

February 18, 2003

Mr. Dave McCarthy
Atlantic Richfield Company
307 E Park Ave.
Anaconda, Montana 59711

SUBJECT: Site Safety and Health Plan, Yerington Mine Site Closure, Yerington Mine Site, Lyon County, Nevada, Revision 2

Dear Mr. McCarthy:

The Nevada Division of Environmental Protection (NDEP) has received and the **Site Safety and Health Plan, Yerington Mine Site Closure, Yerington Mine Site, Lyon County, Nevada, Revision 2**, dated November 21, 2002, regarding the continued environmental investigation of the Yerington Mine, located in Lyon County near Yerington Nevada. This office provides the following comments from EPA. These comments are provided as a courtesy to Atlantic Richfield Company.

EPA Comments:

1) Section 4.0; Atlantic Richfield's section on potential chemicals is pretty sparse. They should at a minimum include the complete COCs from the workplans. They probably should also include radioactive isotopes until they know definitively that they are not present at any levels of concern.

2) Section 4.2.4; This section should be updated to include NDEP. The

current text states that only the Regional Board and EPA should be notified.

- 3) Section 4.2.3; Should include the type of respirator to be used.
- 4) Section 4.3; After basic radiological screening is completed and shows there is no current exposure, I would recommend a radiological badge for their employees.
- 5) Section 6.0; The decontamination procedures are pretty minimal.
- 6) Section 7.4; In the adverse weather section, extreme cold is mentioned. They should also include extreme heat.
- 7) Section 7.8; In the record keeping section, Atlantic Richfield should also include the OSHA record keeping requirements.

Should you have any questions or if I can be of any assistance, please do not hesitate to contact me at (775) 687-9376 or FAX (775) 687-6396. All future correspondence regarding this subject should be addressed to the undersigned.

Sincerely,



Arthur G. Gravenstein, P.E.
Staff Engineer
Remediation Branch
Bureau of Corrective Action

ec: Ms. Jennifer Carr, NDEP

Mr. Doug Zimmerman, NDEP

Cc: Mr. Joe Sawyer, Project Manager, SRK Consulting, 102 Birch Drive, Yerington NV. 89403

Mr. Chuck Zimmerman, Senior Associate, Brown and Caldwell, 3488 Goni Road, Suite 142, Carson City, NV 89706

Mr. Chuck Pope, Deputy Assistant Field Manager, Bureau of Land Management, Carson City Field Office, 5665 Morgan Mill Road, Carson City, NV 89701

Ms. Molly Mayo, Senior Mediator, Meridian Institute, P.O. Box 1829 Dillon, CO 80435

Mr. Elwood Emm, Chairman, Yerington Paiute Tribe, 607 W. Bridge St., Yerington, NV 89447

Mr. Robert Quintero, Chairman, Walker River Paiute Tribe, P.O. Box 220,
Schurz, NV 89427

Mr. Tad Williams, Environmental Director, Walker River Paiute Tribe, P.O. Box
220, Schurz, NV 89427

Mr. Stanley Wiemeyer, U.S. Department of Interior, Fish and Wildlife Service,
1340 Financial Blvd, Suite 234, Reno, NV 89502-7147

Mr. John Krause, Environmental Coordinator, Bureau of Indian Affairs, Phoenix
Area Office, P.O. Box 10, Phoenix, AZ 85001

Ms. Bonnie Arthur, Project Manager, U.S. Environmental Protection Agency,
Region IX, 75 Hawthorne Street, San Francisco, CA 94105

Ms. Phyllis Hunewill, Commissioner, Lyon County, 31 South Main Street,
Yerington, NV 89447 Mr.

Steve Snyder, County Manager, Lyon County, 31 South Main Street, Yerington,
NV 89447

Mr. Dan Newell, Manager, City of Yerington, 102 South Main Street, Yerington,
NV

Mr. Bob McQuivey, Habitat Bureau Chief, Nevada Division of Wildlife, 1100
Valley Road, Reno, NV 89520

Ms. Libby Levy, 75 Hawthorne Street, San Francisco, CA 94105

Ken Paulsen, Behre Dolbear & Company, Inc., PO Box 1930, Arvada CO 80001